

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

THE CHAMBERLAIN GROUP LLC,

*Plaintiff,*

v.

OVERHEAD DOOR CORPORATION, GMI  
HOLDINGS INC.,

*Defendants.*

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CIVIL ACTION NO. 2:21-CV-00084-JRG

**VERDICT FORM**

In answering the following questions and completing this Verdict Form, you are to follow all the instructions that I have given you in the Court's Final Jury Instructions. Your answers to each question must be unanimous. Some of the questions contain legal terms that are defined and explained in detail in the Final Jury Instructions. You should refer to and consider the Final Jury Instructions as you answer the questions in this Verdict Form.

As used herein, the following terms have the following meanings:

- “**Plaintiff**” or “**Chamberlain**” refers to The Chamberlain Group LLC
- “**Defendants**” refers collectively to Overhead Door Corporation and GMI Holdings Inc.
- The “**’404 Patent**” refers to U.S. Patent No. 8,587,404.
- The “**Patent-in-Suit**” refers to the ’404 Patent.
- The “**Asserted Claims**” refers collectively to Claims 4 and 20 of the ’404 Patent.

**IT IS VERY IMPORTANT THAT YOU FOLLOW THE  
INSTRUCTIONS PROVIDED IN THIS VERDICT FORM**

**READ THEM CAREFULLY AND ENSURE THAT YOUR  
VERDICT COMPLIES WITH THEM**

**QUESTION NO. 1**

Did Chamberlain, the Plaintiff, prove by a preponderance of the evidence that Defendants infringed the Asserted Claims of the '404 Patent?

Claim 4

Yes: X

No: \_\_\_\_\_

Claim 20

Yes: X

No: \_\_\_\_\_

**QUESTION NO. 2a**

Did Defendants prove by clear and convincing evidence that **ANY** of the Asserted Claims are invalid due to improper inventorship?

Yes: \_\_\_\_\_ No:   X  

**If you answered "YES" to Question No. 2a, then DO NOT answer Question No. 2b.**

**QUESTION NO. 2b**

Did Defendants prove by clear and convincing evidence that any of the following Asserted Claims are invalid as obvious?

Claim 4 of the '404 Patent: Yes: \_\_\_\_\_ No:   X  

Claim 20 of the '404 Patent: Yes: \_\_\_\_\_ No:   X

**If you answered “NO” to ALL Asserted Claims in Question No. 1, OR “YES” to Question No. 2a, OR “YES” to ALL Asserted Claims in Question No. 2b, then DO NOT answer Question No. 3.**

**Answer Question No. 3 ONLY as to any Asserted Claim that you have found BOTH to be infringed AND not invalid.**

**QUESTION NO. 3**

Did Chamberlain, the Plaintiff, prove by a preponderance of the evidence that Defendants willfully infringed **ANY** of the Asserted Claims that you found were infringed?

Yes: \_\_\_\_\_ No:   X

**If you answered “NO” to ALL Asserted Claims in Question No. 1, OR “YES” to Question No. 2a, OR “YES” to ALL Asserted Claims in Question No. 2b, then DO NOT answer Question Nos. 4a, 4b, and 4c.**

**Answer Question Nos. 4a, 4b, and 4c ONLY as to any Asserted Claim that you have found BOTH to be infringed by Overhead Door’s products AND not invalid.**

**QUESTION NO. 4a**

What sum of money, if paid now in cash, has Chamberlain, the Plaintiff, proven by a preponderance of the evidence would compensate it for its damages for infringement, from May 9, 2017 through March 31, 2022, for the sale of Overhead Door’s products?

Answer in United States Dollars and Cents, if any:

\$ 43.4 million

**QUESTION NO. 4b**

If you awarded any amount of money in Question No. 4a, what amount of that sum, if any, represents a reasonable royalty?

Answer in United States Dollars and Cents, if any:

\$ 2.7 million

**QUESTION NO. 4c**

If you awarded any amount of money in Question No. 4b, is it a lump sum or a running royalty? [Choose only one]:

☐ Lump Sum

☒ Running Royalty



**FINAL PAGE OF THE JURY VERDICT FORM**

You have now reached the end of the Verdict Form and should review it to ensure it accurately reflects your unanimous determinations. The Jury Foreperson should then sign and date the Verdict Form in the spaces below. Once this is done, notify the Court Security Officer that you have reached a verdict. The Jury Foreperson should keep the Verdict Form and bring it when the jury is brought back into the courtroom.

Signed this 27<sup>th</sup> day of January 2023.

  
\_\_\_\_\_  
Jury Foreperson